

EXHIBIT 2

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1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF NEW JERSEY
3

4 IN RE: JOHNSON & JOHNSON)
5 TALCUM POWDER PRODUCTS)
6 MARKETING, SALES PRACTICES,) MDL NO. 16-2738 (MAS) (RLS)
7 AND PRODUCTS LIABILITY)
8 LITIGATION,)
9 _____)
10
11

12 VIDEOCONFERENCE DEPOSITION

13 OF

14 DANIEL CLARKE-PEARSON, M.D. (VOLUME II)

15 (Taken virtually by Defendants)

16 Friday, March 8, 2024

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20 Reported by: Christine A. Taylor, RPR

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24 GOLKOW LITIGATION SERVICES

25 877.370.3377 ph | 917.591.5672 fax

deps@golkow.com

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1 moderate, severe. I'm just going to say it's a
2 37 percent increased risk.

3 Q. Would you attribute 37 percent of
4 her -- would you attribute 37 percent of her
5 [REDACTED] to her [REDACTED]?

6 MS. O'DELL: Object to the form. As
7 Dr. Clarke-Pearson said, this misstates his
8 testimony. He has already said there are
9 other records.

10 THE WITNESS: It contributed -- yes, it
11 contributed to her developing [REDACTED]
12 [REDACTED].

13 BY MS. DAVIDSON:

14 Q. Can you quantify by how much?

15 A. Somewhere between -- I mean, you know,
16 you see the numbers right there, 1.37.

17 Q. Have you reviewed any epidemiological
18 studies since 2021 besides Schildkraut and
19 Penninkilampi that address a potential association
20 between talc use and endometrioid cancer?

21 A. I think there are other papers besides
22 Schildkraut and Penninkilampi that support talc
23 causing endometrioid ovarian cancer.

24 Q. What are they?

25 A. I reviewed them before. I don't -- I